

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' NOTICE OF DESIGNATION OF
CONSULTANTS PURSUANT TO PROTECTIVE ORDER**

Coalition Plaintiffs hereby give notice of their intent to designate the following consultants authorized to receive “ATTORNEYS’ EYES ONLY” material pursuant to Paragraph 5(b)(ii) of the Protective Order entered in this case on July 11, 2019 (Doc. 477): Marilyn Marks, Rhonda J. Martin and Susan Greenhalgh.

Pursuant to the Protective Order, disclosure of “attorney’s eyes only” material to consultants is authorized if two conditions are met. First, the disclosure must be “reasonably necessary for this litigation.” *Id.* Coalition Plaintiffs show that for the Coalition Plaintiffs to prepare for the hearing and, if necessary, trial of this case, counsel for the Coalition Plaintiffs, and their experts, require the assistance and expertise of Ms. Marks, Ms. Martin and Ms. Greenhalgh in connection with the review and understanding of the massive amount of material

that the State Defendants have marked “attorney’s eyes only.”

The second requirement under the Protective Order is that the consultants receiving attorney’s eyes only material sign the Acknowledgment and Agreement to be Bound, attached as Exhibit A to the Protective Order. Coalition Plaintiffs show that Ms. Marks, Ms. Martin and Ms. Greenhalgh have executed those acknowledgments, copies of which are attached as Exhibit A.

Ms. Marks, Ms. Martin and Ms. Greehalgh will be designated “consultants” effective September 9, 2020.

Respectfully submitted this 6th day of September, 2020.

/s/ Bruce P. Brown
Bruce P. Brown
Georgia Bar No. 064460
BRUCE P. BROWN LAW LLC
1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 881-0700

/s/ Robert A. McGuire, III
Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
ROBERT MC GUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance

/s/ Cary Ichter
Cary Ichter
Georgia Bar No. 382515
ICHTER DAVIS LLC
3340 Peachtree Road NE
Atlanta, Georgia 30326
(404) 869-7600

*Counsel for William Digges III, Laura Digges,
Ricardo Davis & Megan Missett*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

E

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Bruce P. Brown
Bruce P. Brown

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER , ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Bruce P. Brown
Bruce P. Brown